

Exhibit A

STATE OF NEW YORK
SUPREME COURT: COUNTY OF DUTCHESS

ELIZABETE GASHI and SAL GASHI, her husband,
Plaintiffs,

-against-

WESTCHESTER COUNTY HEALTHCARE, COMPASS GROUP USA, INC., and
MORRISON MANAGEMENT SPECIALISTS, INC.,

Defendants.

AMENDED COMPLAINT

Index No. 2024-50338

Plaintiffs, ELIZABETE GASHI and SAL GASHI, her husband, as and for their complaint, complaining of the Defendants, WESTCHESTER COUNTY HEALTHCARE, COMPASS GROUP USA, INC., and MORRISON MANAGEMENT SPECIALISTS, INC., does hereby respectfully allege and show to the Court the following:

AS AND FOR A FIRST CAUSE OF ACTION:

FIRST: That at all times hereinafter alleged, the Plaintiffs, Elizabete Gashi and Sal Gashi, resided at Fishkill, Dutchess County, New York.

SECOND: That at all times hereinafter alleged, the Defendant, Westchester County Healthcare was a domestic corporation domestic business corporation with an office or principle place of business located at 241 North Road, Poughkeepsie, Dutchess County, New York.

THIRD: That at all times hereinafter alleged, the Defendant, Compass Group, USA, Inc., was a foreign business duly organized and existing by virtue of the laws of a state other than New York State, with an office for the principal place of business located at 241 North Road, Poughkeepsie, Dutchess County, New York.

FOURTH: That at all times hereinafter alleged, the Defendant, Morrison Management Specialists, Inc., was a foreign business duly organized and existing by

virtue of the laws of a state other than New York State, with an office for the principal place of business located at 241 North Road, Poughkeepsie, Dutchess County, New York.

FIFTH: That heretofore and on or about April 11, 2022, the Plaintiff, Elizabete Gashi, was on the premises of the Defendants, Westchester County Healthcare, Compass Group, USA, Inc., and Morrison Management Specialists, Inc.

SIXTH: That at all times hereinafter alleged, the Defendant, Westchester County Healthcare owned the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

SEVENTH: That at all times hereinafter alleged, the Defendant, Westchester County Healthcare controlled the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

EIGHTH: That at all times hereinafter alleged, the Defendant, Westchester County Healthcare maintained the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

NINTH: That at all times hereinafter alleged, the Defendant, Compass Group, USA, Inc., owned the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

TENTH: That at all times hereinafter alleged, the Defendant, Compass Group, USA, Inc., controlled the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

ELEVENTH: That at all times hereinafter alleged, the Defendant, Compass Group, USA, Inc., maintained the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

TWELFTH: That at all times hereinafter alleged, the Defendant, Morrison Management Specialists, Inc., owned the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

THIRTEENTH: That at all times hereinafter alleged, the Defendant, Morrison Management Specialists, Inc., controlled the premises located at 241 North Road, Poughkeepsie, Dutchess County, New York.

FOURTEENTH: That at all times hereinafter alleged, the Defendant, Morrison Management Specialists, Inc., maintained the premises located at 241 North Road,

Poughkeepsie, Dutchess County, New York.

FIFTEENTH: That the premises of the Defendants, Westchester County Healthcare, Compass Group, USA, Inc., and Morrison Management Specialists, Inc., were not in a reasonably safe condition.

SIXTEENTH: That by reason of the negligence of the Defendants, the Plaintiff, Elizabete Gashi, was caused to trip, fall and suffer injury.

SEVENTEENTH: That the injuries suffered by the Plaintiff, Elizabete Gashi exceeds the jurisdictional limits of this or any other Court.

EIGHTEENTH: That heretofore and on or about April 11, 2022, defendants Westchester County Healthcare, Compass Group, USA, Inc., and Morrison Management Specialists, Inc., contracted to provide food services and proper maintenance of the area in and around the kitchen where plaintiff Elizabete Gashi was injured.

AS AND FOR A SECOND CAUSE OF ACTION:

NINETEENTH: The plaintiffs repeat, reiterate and reallege each and every allegation hereinabove set forth as if more fully set forth hereat.

TWENTIETH: That as a result of the foregoing, the plaintiff, Sal Gashi, had to render extra aid, care and comfort to his wife, Elizabete Gashi, in an effort to heal her from her injuries.

TWENTY-FIRST: That as a result of the foregoing, the plaintiff, Sal Gashi, sustained a loss of consortium, society and companionship of his wife, Elizabete Gashi.

TWENTY-SECOND: That based on the foregoing, the plaintiff, Sal Gashi, demands judgment against the defendant in an amount that exceeds the monetary jurisdictional limits of all Courts within the jurisdiction of the Supreme Court, Dutchess County, New York.

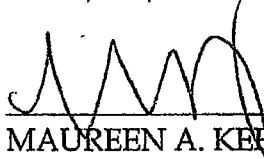
WHEREFORE, Plaintiffs demands judgment against the Defendants in an amount that exceeds the jurisdictional limits of this or any other Court, together with the costs and disbursements of this action, reasonable attorney's fees or as the law shall provide at the time of rendition of the verdict.

Dated: May 9, 2024
Kingston, New York

NYSCEF DOC. NO. 19

RECEIVED NYSCEF: 05/14/2024

Yours, etc.,

A handwritten signature in black ink, appearing to read 'MAUREEN A. KEEGAN', is written over a horizontal line.

MAUREEN A. KEEGAN
BASCH & KEEGAN, LLP

Attorney for Plaintiffs

Office and P.O. Address

307 Clinton Avenue

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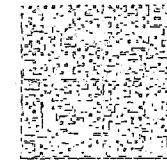
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